

October 15, 2015

Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 10-208
FCC Form 690 Report of General Communication, Inc. for Mobility Fund
Phase I Disbursement of Support

Dear Ms. Dortch,

On behalf of General Communication, Inc. (“GCI”), for the Study Area Codes set forth below, GCI respectfully requests confidential treatment of the drive test data contained in its FCC Form 690 Reports as required for Mobility Fund and Tribal Mobility Fund disbursements pursuant to Section 54.1009 of the Commission’s rules and the *Connect America Fund Order*.¹ The Form 690 Reports have also been submitted to the Universal Service Administrative Company through its E-File System.

MF1 SACs	618001-618218
TMF1 SACs	618337, 618346, 618364, 618366, 618367

GCI will submit shapefiles of its drive test data via the Mobility Fund Phase I Geospatial Data Collection website. Pursuant to Section 0.457 and 0.459 of the Commission’s rules, 47 C.F.R. §§ 0.457, 0.459, GCI requests confidential treatment of the drive test data. In support of GCI’s requests for confidential treatment of the drive test data (the “Confidential Information”), GCI hereby states as follows:

¹ 47 C.F.R. § 54.1009; *Connect America Fund, et al.* Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, 26 FCC Rcd. 17663, 17816 ¶¶ 466-468 (2011) (“*Connect America Fund Order*”).

1. Identification of Specific Information for Which Confidential Treatment Is Sought (Section 0.459(b)(1))

GCI seeks confidential treatment with respect to the shapefiles of its drive test data that it submitted via the Mobility Fund Phase I Geospatial Data Collection website for purposes of GCI's Mobility Fund Phase I disbursement report.

2. Description of Circumstances Giving Rise to the Submission (Section 0.459(b)(2))

GCI is required to disclose the Confidential Information pursuant to the Commission regulations governing Mobility Fund Phase I.² This is sensitive commercial information that GCI does not make otherwise publicly available. Public disclosure of these measures could cause competitive commercial harm to GCI.

3. Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged (Section 0.459(b)(3))

The information for which GCI seeks confidential treatment contains sensitive "trade secrets or privileged or confidential commercial, financial or technical data," which would customarily be guarded from competitors.

4. Explanation of the Degree to Which the Information Concerns a Service that Is Subject to Competition (Section 0.459(b)(4))

The Alaskan wireless market is subject to competition.

5. Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (Section 0.459(b)(5))

Disclosure of GCI's Confidential Information would cause substantial competitive harm. Disclosure would reveal detailed information regarding GCI's network and competitors could use this information to determine GCI's competitive position. Disclosure of GCI's Confidential Information would also place GCI at a competitive disadvantage, as GCI lacks the same information regarding its competitors.

6. Identification of Any Measures Taken to Prevent Unauthorized Disclosure (Section 0.459(b)(6))

GCI has never distributed to the public, government officials, competitors, or customers any of the Confidential Information. GCI will submit the Confidential Information via the Commission's Mobility Fund Phase I Geospatial Data Collection website and will certify that the filing is being submitted pursuant to this request for confidential treatment.

² *Connect America Fund Order* at 17846 ¶¶ 466-468.

7. Identification of Whether the Information Is Available to the Public and the Extent of Any Previous Disclosure of the Information to Third Parties (Section 0.459(b)(7))

GCI's Confidential Information is and shall remain unavailable to the public. As noted in part 6 above, GCI has not previously disclosed to third parties, other than the undersigned counsel, any of the Confidential Information.

8. Justification of Period During Which the Submitting Party Asserts that Material Should Not Be Available for Public Disclosure (Section 0.459(b)(8))

GCI requests that the Confidential Information not be disclosed for 10 years from the date of this request. By that time, the sensitivity of GCI's commercial information will have diminished, as market changes will render it increasingly dated, thus making it difficult for competitors to gauge GCI's current market position and revenues.

Please contact the undersigned if you have any questions.

Sincerely,



Jennifer P. Bagg
Counsel to General Communication, Inc.